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14 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
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16 FEDERAL TRADE COMMISSION,
17 Plaintiff,
18 v.
19 AMG SERVICES, INC., et al.,
Defendants, and
20 PARK 269 LLC, et al.,
21 Relief Defendants.

Case No. 2:12-cv-00536-GMN-VCF

**MOTION FOR LEAVE TO WITHDRAW
SARA J. O'CONNELL AS COUNSEL OF
RECORD**

JUDGE: Hon. Gloria M. Navarro

1 Pursuant to LR IA 11-6, Thomas W. McNamara, the Court-Appointed Monitor, by and
2 through his attorney of record, hereby moves this Court for an Order permitting Sara J.
3 O’Connell to withdraw as counsel in the above-captioned case due to her departure from the firm
4 McNamara Smith LLP. This motion is supported by the accompanying memorandum of points
5 and authorities, the Declaration of Edward Chang, and all pleadings and papers on file in this
6 action.

7 Dated: December 21, 2017

MCNAMARA SMITH LLP

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9 By: /s/ Edward Chang
Attorneys for Court-Appointed Monitor,
10 Thomas W. McNamara
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12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 As of December 11, 2017, Sara J. O’Connell is no longer associated with McNamara
14 Smith LLP. LR IA 11-6(b) provides that “[n]o attorney may withdraw after appearing in a case
15 except by leave of the court after notice has been served on the affect client and opposing
16 counsel.” As set forth in the Declaration of Edward Chang, Thomas W. McNamara has
17 consented to Ms. O’Connell’s withdrawal. By electronically filing this motion, it will be served
18 via the Court’s CM/ECF system.

19 Additionally, “[e]xcept for good cause shown, no withdrawal or substitution will be
20 approved if it will result in delay of discovery, the trial, or any hearing in the case.” LR IA 11-
21 6(e). The withdrawal of Ms. O’Connell will not result in delay of discovery, the trial, or any
22 hearing in the case. Abran Vigil of Ballard Spahr LLP and Edward Chang will continue to act as
23 counsel for Mr. McNamara.

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1 For the reasons set forth above, the Monitor respectfully requests the Court enter an order
2 granting leave for Sara J. O'Connell to withdraw as counsel of record for Thomas W.
3 McNamara. Additionally, Ms. O'Connell should be removed from all future mailings and
4 notices with respect to this case.

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6 Dated: December 21, 2017

MCNAMARA SMITH LLP

7
8 By: /s/ Edward Chang
Attorneys for Court-Appointed Monitor,
9 Thomas W. McNamara

10 IT IS SO ORDERED:

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12 MAGISTRATE JUDGE CAM FERENBACH
13 UNITED STATES MAGISTRATE JUDGE

14 DATED: 12-21-2017
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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December, 2017, pursuant to Fed. R. Civ. P. 5(b), I served via CM/ECF or delivered by email and mailing in the U.S. Mail a true and correct copy of the foregoing a true and correct copy of the foregoing **MOTION FOR LEAVE TO WITHDRAW SARA J. O'CONNELL AS COUNSEL OF RECORD**, postage prepaid and addressed to the following:

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21 /s/ Edward Chang

22 Edward Chang
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